

1 CLARK COUNTY SCHOOL DISTRICT  
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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**  
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10 JILL LEFF, et al,  
11 Plaintiff,  
12 v.

13 CLARK COUNTY SCHOOL  
DISTRICT, a county school  
14 district,  
15 Defendant.

CASE NO.: 2:15-cv-01155-RFB-GWF

**STIPULATION AND ORDER TO CONDUCT**  
**DEPOSITIONS AFTER DISCOVERY**  
**DEADLINE**  
(First Request)

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17 COME NOW the parties, by and through their counsel of record,  
18 and hereby stipulate and agree that the parties may take depositions  
19 of Plaintiffs not deposed during the discovery period for the  
20 purpose of damage issues up to sixty (60) days following a ruling  
21 on dispositive motions. This is the first request to allow  
22 depositions beyond the discovery deadline. This request is not  
23 intended for any reason of delay but to allow the litigation to  
24 proceed in a cost-effective manner consistent with Fed.R.Civ.P. 1  
25 which provides the rules of civil procedure "should be construed,  
26 administered, and employed by the court and the parties to secure

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1 the just, speedy, and inexpensive determination of every action and  
2 proceeding." The parties agree this stipulation will not be used  
3 as a defense or objection to injunctive relief Plaintiffs may seek  
4 nor is this stipulation a waiver of any applicable defense or  
5 objection should injunctive relief be entered by the court.

6 The discovery deadline is April 4, 2017. The dispositive  
7 motion deadline is May 4, 2017. The parties will be filing motions  
8 for summary judgment following the close of discovery. There are  
9 fifteen (15) individual Plaintiffs. While the legal issues are  
10 common to the Plaintiffs, damage issues will be individualized to  
11 the various Plaintiffs. Damage issues will not be relevant to  
12 dispositive motions; therefore, the parties wish to have a ruling  
13 on dispositive motions before expending the time and expense on  
14 depositions for damage issues and which may be avoided depending on  
15 the Court's dispositive motions ruling. Therefore, the parties have  
16 agreed to conduct Plaintiffs' depositions, for Plaintiffs not  
17 already deposed, regarding damage issues only not later than sixty  
18 (60) days after a ruling on dispositive motions should any claims  
19 remain.

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1 Therefore, the parties respectfully request that they be  
2 allowed to conduct depositions of Plaintiffs not already deposed as  
3 to damage issues only no later than sixty (60) days following a  
4 ruling on dispositive motions.

5 Dated this 29<sup>th</sup> day of March, 2017.

6 CLARK COUNTY SCHOOL DISTRICT  
7 Office of the General Counsel

DYER, LAWRENCE, FLAHERTY,  
DONALDSON & PRUNTY

8 By: /s/ S. Scott Greenberg  
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13 **IT IS SO ORDERED:**

15 Dated: April 3, 2017

  
U.S. Magistrate Judge